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Cc: []

From: CN=Erin Foresman/OU=R9/O=USEPA/C=US

Sent: Mon 4/25/2011 4:06:26 AM

Subject: interesting comments coming in
[EPA-R09-OW-2010-0976-DRAFT-0026.1.pdf](#)
[EPA-R09-OW-2010-0976-DRAFT-0027.5.pdf](#)
[EPA-R09-OW-2010-0976-DRAFT-0025.1.pdf](#)

Attached a few for you with little blurbs from each one to give a flavor of the comments..

1. California Coast Keeper

Dear Ms. Foresman:

On behalf of the California Coastkeeper Alliance, which represents 12 Waterkeepers spanning the entire California coast and reaching inward into the San Francisco Bay-Delta Estuary, we welcome the opportunity to provide comments on the above-described Advance Notice of Proposed Rulemaking (ANPR). In brief, CCKA urges U.S. EPA to:

- take aggressive action to regulate pesticide pollution in light of modern data on its ecosystem impacts, and
- mandate that states list waterways impaired by altered flows, and ensure that states take appropriate action to address the impacts to beneficial uses associated with those altered flows.

These issues are described in more detail below.

2. Western States Petroleum Association (specific to N. Bay selenium).

The attachments to our cover letter provide greater detail on these and other key issues we believe are vital to establishing a more accurate understanding for any proposed regulatory development pertaining to selenium in the Bay Delta Estuary that EPA may consider. Our comment package incorporates a Summary of Responses (Summary) to the three questions posed in the ANPR, detailed comments that provide expanded content to the Summary, and supporting documents from the Selenium Characterization Study and the TMDL.

3. CA Water Impact Network - CA Sportfishing Protection Alliance - AquAlliance. Focus on selenium, nutrients, with information on migration corridors and salinity.

A broad range of pollutants as well as water withdrawals affect water quality and aquatic resources in the Bay-Delta. Water from the Sacramento River is relatively clean compared to the waters of the San Joaquin River that are heavily polluted with salts, selenium, boron, nutrients and other contaminants. Any diversion of Sacramento River water around the Delta through an isolated facility will increase the concentration and

residence time of pollutants in the Bay-Delta estuary from the San Joaquin River and other sources. Elimination of dilution and an increase in the residence time of a wide range of pollutants will worsen water quality problems. Therefore any alternative conveyance around the Delta that reduces the amount of Sacramento River water in the Bay-Delta estuary will exacerbate existing water quality problems and result in greater violations of existing water quality standards and criteria, furthering the decline of the overall ecosystem.

We have specific comments and recommendations below on how USEPA and the State of California can achieve water quality and aquatic resource protection goals in one of the West Coast's most ecologically diverse and important aquatic habitats.

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<http://www.epa.gov/region9/water/watershed/sfbay-delta/index.html>